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7 Attorney for Michael Friedman

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 MICHAEL FRIEDMAN,

15 Defendant.

Case No. 2:16-cr-103-GMN-GWF

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
18 United States Attorney, and Dan Schiess, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Brenda
20 Weksler, Assistant Federal Public Defender, counsel for Michael Friedman, that the sentencing
21 hearing currently scheduled for Friday, April 21, 2017 at 9:00 am be vacated and set to a date
22 and time convenient to this Court, but no sooner than sixty (60) days.

23 The Stipulation is entered into for the following reasons:

- 24 1. The client is not in custody and does not oppose the continuance.
25 2. Counsel for the defense needs additional time to investigate and develop
26 mitigating circumstances relevant to sentencing.

1 3. Denial of this request for continuance would deny counsel for the defendant
2 sufficient time to effectively and thoroughly prepare, taking into account the exercise of due
3 diligence.

4 4. Additionally, denial of this request for continuance could result in a miscarriage
5 of justice. The additional time requested by this stipulation is excludable in computing the time
6 within which the trial herein must commence pursuant to the Speedy Trial Act, § 3161(h)(7)(A),
7 considering the factors under Title 18, United States Code §§ 3161(h)(7)(B).

8 This is the first stipulation to continue filed herein.

9 DATED this 13th day of March, 2017.

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11 RENE L. VALLADARES
12 Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

13 By /s/ Brenda Weksler
14 BRENDA WEKSLER
15 Assistant Federal Public Defender

By /s/ Dan Schiess
DAN SCHIESS
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MICHAEL FRIEDMAN,

7 Defendant.

Case No. 2:16-cr-103-GMN-GWF

ORDER

9
10 IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for
11 Friday, April 21, 2017, at the hour of 9:00 a.m., be vacated and continued to
12 June 30, 2017 at the hour of 9:00 a.m. in Courtroom 7C.

13 DATED this 13th day of March, 2017.

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16 UNITED STATES DISTRICT JUDGE
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